

## UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*

Case No. 1:24-MJ-00583

Priority Mail, Tracking Number [REDACTED] addressed  
to [REDACTED]

with a return address of [REDACTED]

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

Priority Mail, Tracking Number [REDACTED], addressed to [REDACTED]  
with a return address of [REDACTED]

located in the Southern District of Ohio, there is now concealed (*identify the person or describe the property to be seized*):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

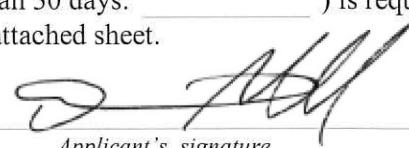
The search is related to a violation of: Title 21

Code Section	Offense Description
21 U.S.C. 841 (a) (1)	Possession with intent to distribute a controlled substance

The application is based on these facts:

See attached affidavit of U.S. Postal Inspector TFO Daniel J. Merrell

- Continued on the attached sheet.
- Delayed notice \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

  
Applicant's signature

Daniel J. Merrell, U.S. Postal Inspector(TFO)  
Printed name and title

Subscribed and sworn to before me by reliable electronic means, specifically, FaceTime video conference, pursuant to Fed. R. Crim. P. 4.1.

Date: Jul 22, 2024



Judge's signature

City and state: Cincinnati, Ohio

Stephanie K. Bowman  
United States Magistrate Judge



## AFFIDAVIT

I, Daniel J. Merrell, having been duly sworn, depose and state:

1. I am a United States Postal Inspector Task Force Officer (TFO) with the United States Postal Inspection Service (USPIS), assigned to the Cincinnati, Ohio Field Office. I have been employed by the United States Postal Inspection Service since September 15, 2022. I have investigative responsibility for southwest Ohio and Northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. I have gained experience from previous drug investigations, ongoing drug trafficking investigations, as well as information corroborated by confidential informants, other law enforcement officers, database records, and through surveillance. I am a sworn peace officer with the Kenton County Police Department and has been so employed for more than ten years. I have received over 300 hours of formal classroom training specifically in the area of drug investigations, to include Drug Enforcement Administration (DEA) Basic Narcotics Investigator School, Illicit Drug Investigations, Kentucky Drug Investigations, Undercover Operations, Drug Investigative Techniques, and several other relevant classes. I have also received the certificate of "Advanced Law Enforcement Officer" from the Kentucky Law Enforcement Council. I obtained my bachelor's degree in Criminal Justice through Liberty University. I am currently assigned to the Northern Kentucky Drug Strike Force (NKDSF) and the United States Postal Inspection Service (USPIS) with duties and responsibilities to investigate drug abuse and drug trafficking offenses. During my tenure, I have investigated, arrested, interviewed, and assisted in the conviction of numerous drug traffickers on both the State and Federal level. As a result, I have interviewed numerous individuals involved in drug trafficking. From these interviews, I have become familiar with the various methods used by drug traffickers to manufacture, conceal, package, transport and distribute their illegal product. I'm aware of the various means used by drug traffickers and drug trafficking organizations (DTOs) to import and distribute their product, launder their monies, and evade detection by law enforcement. Through these experiences I have learned that distributors of illegal drugs employ various methods to avoid detection and thwart efforts by law enforcement including the use of cellular telephone technology, counter and anti-surveillance techniques, elaborately planned smuggling schemes tied to legitimate businesses, false or fictitious identities, straw ownership, and coded communications and conversations. I have also learned that drug traffickers commonly possess firearms to protect their product and proceeds derived from the illegal sales. These investigations have included the use of a variety of investigative techniques and resources, including physical and electronic surveillance, the analysis of telephone records or other forms of communication, and the use of various types of informants and cooperating sources. I have also assisted in undercover operations,

have authored and executed various arrest warrants as well as search warrants of residences and businesses.

3. In March of 2024, I was selected to serve as a canine handler for NKDSF. I am currently a certified canine team with my canine partner "Lisa." Canine Lisa and I are certified as a team through the North American Police Work Dog Association (NAPWDA) in the detection of marijuana, cocaine, heroin, methamphetamine, and their derivatives. I report that "Lisa" passed all of her examinations and has successfully located hidden drugs in the past; I therefore consider "Lisa" to be reliable.
4. This Affidavit is made in support of a search warrant for the following property, namely the United States Postal Service ("USPS") Priority Mail Parcel bearing Tracking Number:
  - a. [REDACTED] (the "**Subject Package**")

5. This Affidavit is made in support of a warrant to search the **Subject Package** for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offense:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841.

Because this Affidavit is submitted in support of the application of the United States to search the **Subject Package**, it does not include every fact known concerning this investigation. I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the **Subject Package**. The **Subject Package** is currently being held at the USPIS Cincinnati Field Office.

6. Based on my training and experience, I have become aware that drug traffickers frequently use Priority Mail Express and/or Priority Mail, services offered by the USPS, to transport narcotics, other dangerous controlled substances, and the mailing of illegal items. As a result of investigations and successful controlled substance prosecutions where Priority Mail Express and/or Priority Mail were used, I have learned of certain characteristics associated with other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other dangerous controlled substances. Some of these characteristics include (but are not necessarily limited to or used on every occasion): false or non-existent return address, addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors

emanating from the package, and the listed address is located in an area of known or suspected drug activity. I am aware that packages containing illegal narcotics can sometimes have correct return address or addressee information. Narcotics traffickers will use legitimate names of residents with or without their permission and knowledge in an attempt to conceal their illegal activities.

7. On or about July 18<sup>th</sup>, 2024, U.S. Postal Inspectors identified and intercepted the **Subject Package** from the Cincinnati Processing and Distribution Center located within the Southern District of Ohio. The **Subject Package** is further described as:

**Priority Mail Parcel bearing Tracking Number:** [REDACTED]

[REDACTED] Weighing approximately 4 Pound and 3.0 Ounces. Postage paid was \$19.25.

**Sender:**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Addressee:**

[REDACTED]  
[REDACTED]  
[REDACTED]

8. I observed the **Subject Package** and reviewed USPS tracking information, which indicated it was mailed from the Anaheim Post Office, Anaheim, CA. 92899, on July 16<sup>th</sup>, 2024.
9. I searched for the listed return address in an investigative database available to law enforcement and other government investigators that contains public-record data about people and businesses, which in my experience has been reliable. The information obtained from the database indicated that [REDACTED] is associated with the sender address of the **Subject Package**.
10. I searched the same database for the listed addressee of the **Subject Package**. The information obtained from the system indicated that [REDACTED] is not associated with the receiver address.
11. On or about July 18<sup>th</sup>, 2024, Postal Inspectors placed the **Subject Package** in a location within the USPIS Cincinnati Field Office. I retrieved my narcotics detection canine “Lisa”. Canine “Lisa” and I are certified by the North American Police Work Dog Association (NAPWDA). I report that “Lisa” passed all of her examinations and has successfully located hidden drugs in the past; I therefore consider “Lisa” to be reliable. I met Postal Inspectors at the USPIS Cincinnati Field Office, where the

**Subject Package** was placed in a separate office among several other similar packages and presented to “Lisa”, who alerted positively to the presence or odor of a controlled substance upon the **Subject Package**. Attached to this Affidavit, and incorporated by reference, is a photocopy of the narcotic canine handler's record of examination.

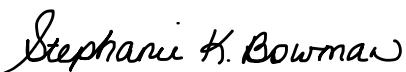
12. Based upon my experience and training, this information, along with the positive alert of narcotic canine “Lisa,” is indicative of the **Subject Package** containing narcotics or proceeds relating thereof.
13. Based upon the information contained in this Affidavit, I believe that there is probable cause to believe that the **Subject Package** will contain evidence and/or contraband, fruits of crime, or other items illegally possessed. Therefore, a search warrant to open the **Subject Package** is requested.

Further, your Affiant sayeth naught.



Daniel J. Merrell  
U.S. Postal Inspector (TFO)

Subscribed and sworn to before me by reliable electronic means, specifically, FaceTime video conference, pursuant to Fed. R. Crim. P. 4.1, on July 22, 2024.



Stephanie K. Bowman  
United States Magistrate Judge



United States Postal Inspection Service  
Pittsburgh Division

### OFFICER AFFIDAVIT

I, AGENT DANIEL MERRELL, AM, AND HAVE BEEN, EMPLOYED BY THE NORTHERN KENTUCKY DRUG STRIKE FORCE. I AM CURRENTLY A TASK FORCE OFFICER (TFO) WITH THE UNITED STATES POSTAL INSPECTOR SERVICE. AMONG OTHER DUTIES, I AM CURRENTLY THE ASSIGNED HANDLER OF NARCOTICS DETECTION CANINE "LISA", WHICH IS TRAINED AND CERTIFIED IN THE DETECTION OF THE PRESENCE OR ODOR OF NARCOTICS DESCRIBED AS FOLLOWS:

Marijuana, Cocaine, Heroin, Methamphetamines, and their derivatives.

ON July 18<sup>th</sup>, 2024, THE FOLLOWING DESCRIBED ITEM WAS PLACED IN A LOCATION AT THE USPIS CINCINNATI FIELD OFFICE BY POSTAL INSPECTORS WHERE "LISA" DID ALERT TO AND INDICATE UPON THE FOLLOWING DESCRIBED ITEM:

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Priority Mail Parcel, Tracking Number [REDACTED] addressed to [REDACTED]  
[REDACTED] with a return address of [REDACTED]

BASED ON MY TRAINING AND EXPERIENCE AND THAT OF "LISA", I CONSIDER THE ABOVE-DESCRIBED ITEM TO CONTAIN WITHIN OR UPON THE PRESENCE OR ODOR OF A NARCOTIC OR OTHER DANGEROUS CONTROLLED SUBSTANCE.

  
7/18/2024  
(Signature and Date)

UNITED STATES DISTRICT COURT  
for the  
Southern District of Ohio

In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)

Priority Mail, Tracking Number [REDACTED]  
addressed to [REDACTED]

[REDACTED] with a return address of [REDACTED]

) Case No. **1:24-MJ-00583**

**SEARCH AND SEIZURE WARRANT**

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Southern District of Ohio

(identify the person or describe the property to be searched and give its location):

Priority Mail, Tracking Number [REDACTED], addressed to [REDACTED]  
with a return address of [REDACTED]

The person or property to be searched, described above, is believed to conceal (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property.

**YOU ARE COMMANDED** to execute this warrant on or before

August 5, 2024

(not to exceed 14 days)

in the daytime 6:00 a.m. to 10 p.m.  at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to United States Magistrate Judge

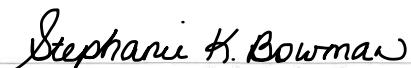
Stephanie K. Bowman

(name)

I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)  for \_\_\_\_\_ days (not to exceed 30).

until, the facts justifying, the later specific date of \_\_\_\_\_.

Date and time issued: 1:01 PM, Jul 22, 2024

  
Stephanie K. Bowman  
Judge's signature



City and state: Cincinnati, Ohio

Stephanie K. Bowman  
United States Magistrate Judge

*Printed name and title*

AO 93 (Rev. 12/09) Search and Seizure Warrant (Page 2)

<b><i>Return</i></b>		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
<i>Inventory made in the presence of :</i>		
<i>Inventory of the property taken and name of any person(s) seized:</i>		
<b><i>Certification</i></b>		
<i>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</i>		
Date:	<hr/>	
	<i>Executing officer's signature</i>	
<hr/> <i>Printed name and title</i>		